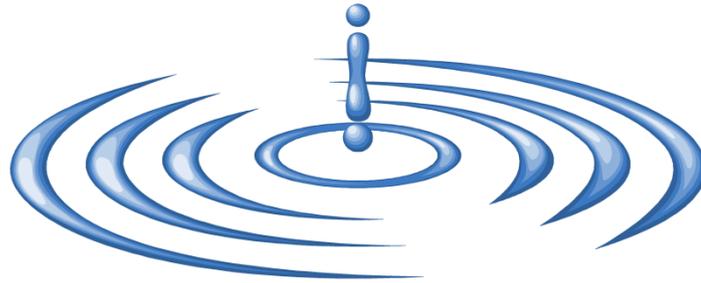


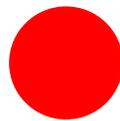
# The Serendipity Centre Ltd



*Every child deserves a chance*

*The past is something that's gone forever  
The future is something we will work on together*

## **SAFEGUARDING POLICY**



November  
2016

distribution

**UNRESTRICTED**

## Scope

This document is the Safeguarding Children Policy of The Serendipity Centre Ltd (TSCL). The policy is in line with the procedures set out by the Local Safeguarding Children's Board 0 and applies to any, and all, adults working in any care, therapy or education service trading under the name of TSCL. This policy has been approved and endorsed by TSCL's director.

## Introduction

TSCL fully recognises its responsibility to safeguard and protect children. Safeguarding children is everyone's responsibility. The Children Acts 1989 and 2004 state that the welfare of children and young people is paramount. This includes their right to be safeguarded against all forms of child maltreatment, including sexual exploitation. All staff should be alert to the possibility and indicators of child maltreatment and understand the procedures to be taken to raise concerns.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Safeguarding is a key priority and of paramount importance at TSCL because of the difficulties and traumas experienced by many of the young people which TSCL provides care, therapy and education services to. Central to TSCL's ethos is a "whole team" approach and as a result, safeguarding the welfare of the young people is embedded in our culture and their daily lives. TSCL's pro-active approach ensures that safeguarding and protecting children is a key part of everyone's role. Staff receive access to training and support to recognise it is their responsibility to create a caring, friendly and safe environment and know how to take action to protect children from harm. Both the young people and the staff team are supported by TSCL's safeguarding designated professionals to fulfil their safeguarding responsibilities.

The use of skilled and highly-consistent behaviour management by the whole team helps create a culture of care, learning and keeping safe. Linked to this is an open and transparent forum for discussing the needs of the young people and a multi-disciplinary approach to the support of their individual needs **Error! Reference source not found.**

To achieve this we will:

- ensure safe recruitment practices are followed that involve checking the suitability of staff and volunteers to work with our young people.
- raise awareness of safeguarding issues and equip young people with the skills needed to keep them safe.
- develop, implement and continually review procedures for identifying and reporting cases, or suspected cases, of child maltreatment.
- support our young people who have been maltreated in accordance with their agreed child protection plan.
- establish a safe environment in which our young people can learn and develop.

## Applicable Documents

When reading this document, please be aware of the following related documents.

The Children Act 2004 MSO (2004). TSO, London

The Sexual Offences Act, 2003  
HMSO (2003). TSO, London

Keeping Children Safe in Education (2016) Ref: DfE-00140-2016

Working Together to Safeguard Children  
HM Government (2015) DFE-00130-2015

Children's Homes (England) Regulations (2015)

Safeguarding Children and Young People from Sexual Exploitation (DCSF 00689-2009)

## Relevant Policies

Allegations Management Policy  
The Serendipity Centre Ltd

Discipline Policy  
The Serendipity Centre Ltd

Behaviour Management Policy  
The Serendipity Centre Ltd

Recruitment Policy  
The Serendipity Centre Ltd

Public Interest Disclosure (Whistle blowing) Policy  
The Serendipity Centre Ltd

Safeguarding Children Procedures  
4LSCB

Information Sharing and Security Policy  
The Serendipity Centre Ltd

## Abbreviations and Acronyms

Abbreviation or Acronym	Description
LSCB	Local Safeguarding Children Board
AD	Applicable Document
DoE	Department of Education
DoH	Department of Health
Ofsted	Office for Standards in Education
FGM	Female Genital Mutilation
DOFA	Designated Officer for Allegations (previously LADO)

## Responsibilities

### The TSCL Director will:

- ensure that there is an executive lead responsible for the safeguarding children arrangements across the whole organisation and that they are appropriately qualified to undertake this role and responsibility.
- ensure there is a designated safeguarding lead in The Serendipity School to achieve compliance with paragraph 7(b) of the Schedule to the Education (Independent School Standards) Regulations 2014, made under sections 94(1) and (2) of the Education and Skills Act 2008, which states that the arrangements to safeguard or promote the welfare of pupils made by the proprietors of independent schools (including academies or free schools) or alternative provision academies must have regard to any guidance given by the Secretary of State; and paragraph 3 of the Schedule to the Education (Non-Maintained Special Schools) (England) Regulations 2011, made under section 342 of the Education Act 1996, which requires arrangements for safeguarding and promoting the health, safety and welfare of pupils in non-maintained special schools to have regard to any guidance published on such issues.
- ensure that the TSCL has a Safeguarding policy and that TSCL procedures are consistent with LSCB procedures and that all employees receive advice, training and supervision from designated safeguarding leads to comply with those procedures.
- ensure that all employees who works for TSCL know who to contact if they have a concern about the safety or wellbeing of a child or young person.
- ensure that company policies are implemented and ensure when they are not that a review is undertaken to learn and improve practice.
- ensure that there are sufficient resources and access to appropriate training to enable the designated safeguarding leads to carry out their duties responsible.
- ensure that staff are able to raise any concerns about poor or unsafe practices.
- ensure that there are procedures in place to manage allegations against staff.
- ensure that recruitment procedures are followed as set out in the *Recruitment Policy*.

### Safeguarding Arrangements in TSCL

The Chief Executive is the designated person with specific responsibility for all safeguarding arrangements across the company. The Head Teacher is the Designated Officer Safeguarding Children for The Serendipity School. The Head of Transitions is the Deputy Designated Officer Safeguarding Children across the company.

Registered Managers in each of the residential children's home provided by TSCL has a lead role in supporting their staff team to fulfil their safeguarding responsibilities.

### Key Responsibilities of The Designated Safeguarding Children Leads

- To refer or support other staff to refer suspected cases of child maltreatment to the appropriate authorities.
- To ensure that all staff have training to recognise and identify signs of child maltreatment, and when it is appropriate to make a referral, and to understand child protection procedures.
- To raise awareness of child safety issues across the company.

- In conjunction with the director ensure that the company has an up-to-date Safeguarding Children Policy .
- To ensure that the Director, parents and carers are kept informed (unless themselves the subject of an allegation of child maltreatment).
- To co-operate with the Designated Officer for Allegations (DOfA) in the local authority (previously LADO), Ofsted, Social Care Departments and the Police in relation to any allegations of child maltreatment made against any staff member including the Director, including possible involvement in multi-agency strategy discussions.

## Staff Responsibilities

All staff are expected to play a part in maintaining a safe environment and in the prevention of child maltreatment. Staff are responsible for helping our young people to understand what is acceptable behaviour towards them, and encourage young people to speak out if they are worried and to ensure their concerns are listened to. Staff are required to share concerns with one of TSCL designated safeguarding leads. Staff should be aware that failure to report actual or suspected physical, sexual or emotional child maltreatment or neglect of a child may result in disciplinary procedures being invoked.

All staff (including agency staff) have a **duty** to report to the appropriate statutory agency (i.e. children's social care and/or the police) any concerns they may have about practices, or the behaviour of any colleague, which they consider likely to put children at risk of child maltreatment or other serious harm. Should this occur out-of-hours, they should follow the Out-Of-Hours on call protocol.

Staff reporting an allegation or concern in good faith are guaranteed protection of their own position and prospects in line with TSCL's *Whistleblowing Policy*.

## Parents and Carers

Parents/carers/professionals are provided with, and encouraged to read the TSCL Safeguarding Policy. This document is made available as part of our admission pack and is also available on our website [www.serendipity-education.com](http://www.serendipity-education.com).

Parents, carers, or anyone who comes in to contact with TSCL who may have a concern about any service offered by TSCL, and who do not feel that they can talk to anyone within the company, can either contact the Local Safeguarding Children Board or Ofsted with their concerns. Ofsted can be contacted on 0300 123 1231, or at [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk).

## Definitions and Recognition of Child Maltreatment

Child maltreatment may be defined as follows.

- Child maltreatment is a violation of an individual's human and civil rights by any other person or persons and may be perpetrated by adults or children.
- Child maltreatment may consist of a single act or repeated acts.
- The child maltreatment can be physical, emotional, sexual, or neglect.
- Child maltreatment can be seen as an act of negligence or omission to act and maybe the unintended consequences of a person's actions.
- Child maltreatment can and may occur when a child is persuaded to enter into financial or sexual transactions to which they have not consented or cannot consent to.

Child maltreatment may take the following forms

**Physical Abuse** - includes hitting, slapping, pushing, kicking, misuse of medication, undue restraint or inappropriate sanctions.

**Sexual Abuse** - includes rape and sexual assault or sexual acts to which the person has not or could not consent and/or was pressured into consenting. Child Sexual Exploitation (CSE) is a form of sexual abuse. It is the coercion or manipulation of children and young people into taking part in sexual activities, usually involving an exchange of some form, which can include money, mobile phones and other items, such as drugs, alcohol, a place to stay, protection or affection. The vulnerability of the young person and grooming process employed by perpetrators renders them powerless to recognise the exploitative nature of relationships and unable to give informed consent. CSE is a particularly hidden form of child maltreatment and recent evidence indicates that children who are, or have been in care, are more vulnerable. Disclosure of this form of child maltreatment is rare. Vulnerability and risk indicators of CSE are well established and it is possible to evidence risks.

**Female Genital Mutilation (FGM)**- Staff need to be alert to the possibility of a young person being at risk of FGM, or already having suffered FGM. There are a range of potential indicators that a child or young person may be at risk of FGM: individually these indicators may not signify risk but if there are two or more indicators present there could be a possible risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Where a concern relating to possible FGM is identified staff should follow TSCL safeguarding protocol. It is a legal requirement to report all suspected cases of FGM to the police.

**Psychological Abuse** - includes threats of harm, abandonment, humiliations, verbal or racial child maltreatment, isolation, withdrawal from services or supportive networks. It also includes radicalisation and any other forms of exploitation.

**Financial or Material Abuse** - includes theft, fraud, pressure around wills, property or inheritance, misuse or misappropriation of benefits.

**Neglect and Acts of Omission** - includes failure to access medical care or services, negligence in the face of risk taking, failure to give prescribed medication, poor nutrition or lack of heating.

Other types of child maltreatment include Hate Crime which is targeting a person's difference and Mate Crime where victims consider their perpetrators to be their friends. Some child maltreatment is considered a criminal offence i.e. some extremes of physical child maltreatment, financial child maltreatment, sexual child maltreatment and wilful neglect and ill treatment.

## Signs of Child maltreatment

The effective recognition of signs and symptoms of child maltreatment requires staff to be vigilant and open to both the possibility and occurrence of non-accidental injury or other forms of child maltreatment. It also depends upon staff understanding and discharging their duty to report any safeguarding concerns they may have to the designated safeguarding leads in TSCL.

The following list, although not exclusive or exhaustive, describes many of the signs and symptoms that may indicate the presence of child maltreatment.

Type of child maltreatment	Examples	Possible signs and symptoms
<b>Physical Abuse</b>	<ul style="list-style-type: none"> <li>• Hitting</li> <li>• Slapping</li> <li>• Pushing</li> <li>• Kicking</li> <li>• Misuse of medication</li> <li>• Unnecessary Restraint</li> </ul>	<ul style="list-style-type: none"> <li>• Fractures</li> <li>• Sprains</li> <li>• Dislocations</li> <li>• Lacerations</li> <li>• Scalds/burns</li> <li>• Pressure sores</li> <li>• Bruising</li> <li>• Malnutrition</li> <li>• Unexplained injuries</li> <li>• Signs of medication misuse (over or under)</li> <li>• Untreated medical problems</li> <li>• Incontinence</li> <li>• Self-harm</li> </ul>
<b>Sexual Abuse</b>	<ul style="list-style-type: none"> <li>• Rape and sexual assault or sexual acts to which the person has not consented to, or could not consent to, or was pressured into consenting to</li> <li>• Inappropriate touch</li> <li>• Child sexual exploitation (illegal activity by people who have power over young people and use it to sexually abuse them).</li> </ul>	<ul style="list-style-type: none"> <li>• Pain, itching, bleeding or bruising in the genital area</li> <li>• Difficulty in walking or sitting</li> <li>• Torn or stained clothing</li> <li>• Venereal disease</li> <li>• Changes in behaviour</li> <li>• Sexualised behaviour</li> <li>• Pregnancy</li> <li>• Young person having multiple mobile phones</li> <li>• Unexplained gifts, or cigarettes</li> <li>• Seemingly “consensual” relationships</li> <li>• Secret use of mobiles and the internet</li> </ul>
<b>Emotional or Psychological Abuse</b>	<ul style="list-style-type: none"> <li>• Bullying, including cyber bullying (the use of information and communication technologies to support deliberate, repeated, and hostile behaviour by an individual or group that is intended to harm others)</li> <li>• Threats of harm or abandonment</li> <li>• Deprivation of contact, isolation or withdrawal from services or support networks</li> <li>• Humiliation, blaming, controlling</li> <li>• Intimidation, coercion</li> <li>• Harassment, verbal child maltreatment</li> </ul>	<ul style="list-style-type: none"> <li>• Fear</li> <li>• Depression</li> <li>• Withdrawal</li> <li>• Passivity</li> <li>• Confusion</li> <li>• Low self-esteem</li> <li>• Deference</li> <li>• Aggression</li> <li>• Resignation</li> <li>• Ambivalence</li> <li>• Disturbed sleep pattern</li> <li>• Weight loss</li> <li>• Running away</li> <li>• Self-harm</li> <li>• Imitative behaviour</li> </ul>

	<ul style="list-style-type: none"> <li>• Critical and undermining comments</li> <li>• Intrusive and inappropriate comments and questions</li> <li>• Offensive language or behaviour that is directed at a person because of disability, ethnic origin, race, skin colour, culture, sexual orientation, size, gender or age</li> <li>• Any other form of harassment, slurs or similar treatment</li> <li>• Radicalisation</li> </ul>	<ul style="list-style-type: none"> <li>• A change in behaviour or appearance</li> <li>• Use of extremist language or expression of extremist views</li> <li>• A change in clothing</li> <li>• Questioning of their identity and belonging</li> <li>• Accessing websites which promote extremism</li> <li>• Being mindful of existing</li> </ul>
<b>Financial Abuse</b>	<ul style="list-style-type: none"> <li>• Theft</li> <li>• Fraud</li> <li>• Exploitation</li> <li>• Pressure in connection with wills, property, inheritance or financial transactions</li> <li>• The misuse or misappropriation of property, possessions or benefits</li> </ul>	<ul style="list-style-type: none"> <li>• Inadequate money to pay bills</li> <li>• Disappearing benefit payments</li> <li>• Sudden or large withdrawal from bank account</li> <li>• Inadequate clothing</li> <li>• Lack of personal belongings</li> <li>• Poor standard of possessions</li> </ul>
<b>Neglect and Acts of Omission</b>	<ul style="list-style-type: none"> <li>• Ignoring medical or physical care needs</li> <li>• Failure to provide access to appropriate health, social care or educational services</li> <li>• The withholding of the necessities of life such as medication, adequate nutrition and heating</li> </ul>	<ul style="list-style-type: none"> <li>• Dehydration</li> <li>• Malnutrition</li> <li>• Unexplained failure to respond to prescribed medication</li> <li>• Infections</li> <li>• Pressure sores</li> <li>• Inadequate clothing</li> <li>• Hypothermia</li> </ul>

## Safeguarding Measures

TSCL recognises that because of the day to day contact with children, staff are best placed to observe the outward signs of child maltreatment. We will therefore

- follow statutory guidance<sup>1</sup>

<sup>1</sup> HM Government (2015) Working Together to Safeguard Children. Crown Copyright.

- establish and maintain an environment where our young people feel secure, are encouraged to talk, and are listened to
- ensure our young people know that there are adults around whom they can approach if they are worried
- include opportunities in the curriculum and residential support plans for our young people to develop the skills they need to recognise and stay safe from child maltreatment
- promote all young people to have a voice in house meetings and encourage the use of worry/complaint forms
- notify Social Care if there is an unexplained absence from school of more than two days of a young person who is subject to a child protection or child in need plan
- develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters including attendance at case conferences
- keep written records of incidents and concerns about young people in line with the *TSCL incident reporting procedure*, even where there is no need to refer the matter immediately. The actions taken by staff in response to the incident or concern will also be recorded on the incident form and all safeguarding paperwork will be logged in bound books
- ensure that in interviews,
  - confidentiality is not assured to a young person giving evidence
  - the interviewer will take care not to ask leading questions
- ensure all evidence is clearly and carefully documented
- ensure all records are kept securely, in the young person's main file, and in locked locations
- ensure that the appropriate statutory agency (i.e. Social Care and/or the Police) is informed of any disclosure or suspicion of child maltreatment within 24 hours and that this is followed up in writing within 48 hours.
- where an allegation is made against a member of staff or volunteer, follow the procedures set out in the *Allegations Management Policy* in line with the Hampshire, Portsmouth, Southampton and the Isle of Wight Local Safeguarding Children Boards (4LSCB) procedure: *Managing Allegations Against People who Work with Children Procedure*
- where an allegation is made against a young person, by another young person, the matter will be referred to Social Care in line with the 4LSCB procedure; *Child Maltreatment by Children and Young People Procedure*
- ensure that Ofsted is informed of any allegation of child maltreatment on the premises (substantiated or not) without delay
- ensure that the relevant authority is notified of any allegation or suspicion of child maltreatment involving any child placed by that authority within any of the companies establishments, without delay
- report to the Social Care and Police any evidence known of children becoming involved in sexual exploitation, or of unauthorised persons picking children up, contacting children, or observed trying to make contact with children outside
- ensure that safer recruitment practices are always followed as set out in the *Recruitment Policy* including performing Disclosure and Barring (DBS) checks on all persons in regulated activity with young people
- report to the Disclosure and Barring Service, within one month of leaving employment with TSCL, any person whose services are no longer used because they are considered unsuitable to work with young people
- the designated safeguarding leads will undergo safeguarding training to level 5 and undertake at least 16 hours continuous professional development relevant to safeguarding practice every three years

- all staff will be trained to at least level 2 before working unsupervised within TSCL and within a year of employment to level 3. Once they complete the level 3 training they will be required to undertake a minimum of 8 hours safeguarding development to promote their competency and skill every three years.

Where there is a **serious** and **immediate** threat to a young person, staff will:

- seek to ensure the young person's safety, without endangering themselves
- assess the situation and, where someone is at severe risk of harm, contact the emergency services by dialling 999
- speak with the designated safeguarding lead within 2 hours (out of hours the 2<sup>nd</sup> tier on call)
- seek to ensure the young person has no contact with the alleged perpetrator. It may be necessary to inform staff on what they need to do to keep the young person safe. Staff will be informed of everything they need to know to ensure the young people are kept safe
- if a staff member, for some reason, believes that the matter will not be dealt with effectively, they may contact the local authority themselves.

## Support for Our Young People

TSCL staff recognise that children and young people who are maltreated or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation, shame and some sense of blame. Staff at TSCL may be the only stable, secure and predictable element in the lives of young people at risk. When staying with us their behaviour may be challenging and defiant and/or they may be withdrawn. We will endeavour to support our young people by:

- developing an ethos which promotes a positive, supportive and secure environment which gives our young people a sense of self-worth
- developing a interdepartmental and multi-agency approach which includes fortnightly meetings with registered managers, monthly safeguarding meetings of designated leads, weekly MDT meetings and network meetings
- the content and arrangement of the activities / curriculum in school setting (if necessary, on a one-to-one basis)
- liaising with other agencies that support young people such as Social Care, the Police, the Child and Adolescent Mental Health Service, the Education Welfare Service and the Educational Psychology Service
- offering additional support in addition to any that may be provided by the above services
- ensure that, when a young person on the child protection plan leaves TSCL, their information is transferred to the new placement immediately and that the child's social worker is informed.

## Managing Disclosures

### Disclosure from a young person

- Listen to the young person
- Do not promise confidentiality
- Advise the young person what happens next
- Never ask leading questions, Who, What, Where, When; use reflective listening
- Do not say words for them, however embarrassed they are to say them
- Report any allegations immediately in line with the allegations management policy
- Record:
  - all details
  - all details and times of conversation and telephone calls

- fill in an incident form
- log the incident in the appropriate bound book.

## Disclosure from a staff member

A staff member may disclose a concern to their manager. Where this is a concern involving a risk of harm to any young person, the manager must follow the safeguarding procedures. Senior staff should be conscious of the *Whistleblowing Policy* in such circumstances.

## Confidentiality and Information Sharing

All staff employed by TSCL are expected to observe the principles of confidentiality and adhere to the *Information Sharing Policy*. However, the safeguarding needs and wellbeing of children at risk take precedence over issues of confidentiality; therefore all concerns, even if they constitute an apparent breach of confidentiality, should be reported to the designated safeguarding lead.

Similarly, TSCL reserves the right, where appropriate, to inform outside agencies when permission to do so has not been given by a member of staff, young person, parent, carer or social worker.

Once a safeguarding procedure has been initiated, information will only be shared on a need-to-know basis but common sense should prevail. Not every member of staff needs to know the details of what the concern is, but all those directly involved with the young person should know what is going on and should be kept appropriately informed. In particular all staff involved with the young person should be made aware of their responsibilities.

## Reporting and Recording

All concerns about our young people will be recorded on an incident form. In addition to these forms, it is recognised that as part of normal life, there may be occasions when other documents may arise that contain details relating to a case of child maltreatment or suspected child maltreatment. Such documents will immediately be classified as **confidential**. All documents that relate to child safeguarding issues will be kept in a secure, locked place and be accessible to relevant personnel involved in safeguarding the young person.

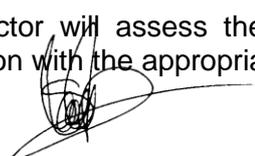
This policy is available via [www.serendipity-education.com](http://www.serendipity-education.com) website and copies are also available on the company's intranet.

## Monitoring and Review

In order to ensure that it reflects current best practice, this policy will be reviewed by the Senior Leadership Team every two years or following changes to statutory guidance.

The Director will assess the progress of the policy and will decide on any changes in conjunction with the appropriate staff.

Signed:  
Director



November 2016